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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

## ALL MATTERS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE FILED  
UNDER SEAL**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G - 15th Floor

I, Laura Vartain Horn, declare as follows:

1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Consider Whether Another Party’s Materials Should Be Filed Under Seal.

2. Attached as **Exhibit A** is the Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials, with redactions related to Plaintiff's confidential materials.

3. Attached as **Exhibit B** is Ex. 1 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials (sealed in full).

4. Attached as **Exhibit C** is Ex. 2 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials (sealed in full).

5. Attached as **Exhibit D** is Ex. 3 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials (sealed in full).

6. Attached as **Exhibit E** is Ex. 4 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials (sealed in full).

7. Attached as **Exhibit F** is Ex. 5 to Joint Discovery Letter re Deficient Production of Plaintiffs' Expert Materials (sealed in full).

Dated: January 2, 2026

/s/ Laura Vartain Horn  
Laura Vartain Horn